

1 from the plaintiffs' lawyers; is that correct?

2 Several months ago .

3 A. Uh-huh.

4 Q. All right. You've done a good job
5 answering questions today, but I know we're kind of
6 getting a little late in the day, and we all get a
7 little bit tired. And you're saying uh-huh and
8 huh-uh, and I understand you just fine, but that
9 makes his job unmercifully --

10 A. I'm sorry. I will say yes or no.

11 Q. All right. If I ask you if
12 something is a yes or a no, I'm not at all trying to
13 be difficult. I'm just trying to make a clear
14 record, okay?

15 MS. BAEHR-JONES: I'm going to
16 object. Defense counsel is's characterizing
17 her testimony.

18 MR. RADER: I don't know what
19 you're talking about, Mr. Baehr-Jones, but
20 I'm going to keep on going.

21 Q. (BY MR. RADER) You were -- I'm
22 going to start back at the exhibits.

23 Do you have the exhibits?

24 A. I do.

25 Q. Let's put them in order.

22 Q. (BY MR. RADER) All right. Now, you
23 were asked about speaking to Kevin Peters.

24 A. Yes.

25 Q. Of course, his name has been said

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202

1 today I know by me.

2 When you were shown the email by
3 Ms. Baehr-Jones from Tyler Whitlock, did that
4 refresh your memory?

5 A. It triggered that I had that in my
6 phone. Tyler JCPD. Not Kevin JCPD.

7 Q. Did anybody at all coach you to
8 change your testimony or say a different name?

9 MS. BAEHR-JONES: Objection.

10 A. No, sir.

11 Q. (BY MR. RADER) All right. And
12 nobody told you to change your phone or create a
13 contact in your phone.

14 MS. BAEHR-JONES: Objection.

15 A. No, sir.

16 Q. (BY MR. RADER) It's offensive when
17 people make these kinds of allegations, isn't it?

18 MS. BAEHR-JONES: Objection.

19 A. It's horribly offensive.

20 MS. BAEHR-JONES: Objection.

21 Q. (BY MR. RADER) All right. I want
22 to show you the Tennessee Secretary of State entry
23 for Skyline Restoration.

24 MR. RADER: This is one that is
25 not Bate stamped, Ms. Baehr-Jones, and I'm

1 trying to hand you a copy if you'd like it.

2 MS. BAEHR-JONES: Thank you.

3 Q. (BY MR. RADER) And what name does
4 it say on there as the principal contact?

5 A. Avery Myers.

6 Q. All right. You don't have any
7 interest in that business at all, do you?

8 A. No, sir. I never have.

9 Q. Down in the bottom right-hand
10 corner of that box in the middle of the page it
11 says, "Number of members."

12 Do you see that?

13 A. Uh-huh.

14 Q. How many members does it say?

15 A. One.

16 Q. You're not one of those one member,
17 are you?

18 A. I'm not Avery Myers. No.

19 Q. Okay. You -- just because you had
20 a business with a similar name, Skyline Contracting,
21 that I think that you said never really got off the
22 ground, that doesn't mean you're connected with
23 every entity that uses the word Skyline, are you?

24 A. No. I'm definitely not.

25 MR. RADER: All right. We'll make

1 that Exhibit No. 92.

2 (Exhibit 92 marked).

3 Q. (BY MR. RADER) Now, Skyline is the
4 company that you used as a subcontractor on your
5 Public Service Building; is that correct?

6 A. That is correct.

7 Q. Do they do good work?

8 A. They do good work. And I would
9 work with them again. I think they feel the same
10 way.

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205

13 Q. Okay. Ms. Baehr-Jones asked you a
14 number of questions about entries on some of these
15 exhibits for commercial cash, and you explained what
16 you understood that to be.

17 Do you remember that?

18 A. I do.

19 Q. I'm going to show you just a few
20 statements. And we will look at the bank statement
21 for Glass & Concrete Contracting for April 30th,
22 2018 through May 31st, 2018, which is RENASANT611.

23 And will you take a minute, ma'am,
24 and go through that and look for -- there should be
25 a \$30,000 entry for commercial cash about May 23rd.

1 Do you see that?

2 MS. BAEHR-JONES: Danny, are you

3 going to be providing me with copies of the

4 exhibits that you're using with the witness?

5 MR. RADER: I've just told you the

6 Bates.

7 MS. BAEHR-JONES: Does it look like

8 I have a computer in front of me?

9 MR. RADER: Your co-counsel has it.

10 You can look at hers.

11 MS. BAEHR-JONES: Are you going to

12 be giving copies of the exhibits that you

13 use to --

14 MR. RADER: Ms. Baehr-Jones, I'm

15 not going to repeat myself. I've already

16 had this conversation with you.

17 If you have an objection, just make

18 it.

19 MS. BAEHR-JONES: I need to take a

20 break.

21 A. I do see that.

22 MR. RADER: Opposing counsel wants

23 to take a break.

24 COURT REPORTER: Do you want to go

25 off the record?

1 MS. BAEHR-JONES: Actually, let's
2 stay on the record. Let me just confer with
3 counsel to see if there's a possibility to
4 use the computer.

5 VIDEOGRAPHER: Going off the record
6 at 3 --

7 COURT REPORTER: No.

8 MR. RADER: If you want to take a
9 break of this length, we'll go ahead and go
10 off the record.

11 COURT REPORTER: Okay. Kelly,
12 we'll go off the record now.

13 VIDEOGRAPHER: Going off the record
14 at 3:50.

15 (Off the record at 3:50 p.m.)

16 (On the record at 4:12 p.m.)

17 VIDEOGRAPHER: And we're on the
18 record at 4:12.

19 BY MR. RADER:

20 Q. All right. We've taken a break
21 there, FEMALE 4 and I appreciate that.

22 You have this document that starts
23 with RENASANT611, which is the monthly statement for
24 this May 31st, 2018, month ending.

25 And you've turned and you found an

1 entry for commercial cash on May the 23rd?

2 A. Yes, sir.

3 Q. On Bate 619, correct?

4 A. Correct.

5 Q. And was that a cash withdrawal?

6 A. No.

7 Q. All right. If you turn to

8 Page 626 --

9 MS. BAEHR-JONES: Objection.

10 MR. RADER: I haven't finished my
11 question yet, but you're welcome to object
12 in advance if you want to.

13 MS. BAEHR-JONES: That was to your
14 last question. Go ahead. Go ahead. Go
15 ahead.

16 Q. (BY MR. RADER) If you turn to
17 Page 626, do you see a checking withdrawal ticket
18 there in the same amount?

19 A. I do.

20 Q. Does it have the same date on it?

21 A. It does.

22 Q. And does it have a reason over on
23 the left side?

24 A. It's a line of credit payment.

25 MR. RADER: All right. And I'll --

1 let me make that document Exhibit 96 --
2 COURT REPORTER: 90 --
3 MR. RADER: 96.
4 MS. BAEHR-JONES: 93.
5 MR. RADER: 93. I'm going sideways
6 instead of down.
7 (Exhibit 93 marked).
8 MS. BAEHR-JONES: Sorry. What was
9 the dates Bates for this? We're scrolling
10 here and we kind of got lost.
11 MR. RADER: Sure. We started on
12 611. Then we went to 619. Then we went to
13 626.
14 MS. BAEHR-JONES: And what are you
15 making the exhibit?
16 MR. RADER: The package, that
17 entire bank statement for the month of
18 May 2018, 611 through 626.
19 Q. (BY MR. RADER) And I'll ask you now
20 to look at RENASANT1182.
21 MS. BAEHR-JONES: Give us a second
22 to get there.
23 MR. RADER: Sure.
24 We'll make that 94 while we wait
25 for them to get there.

1 (Exhibit 94 marked).

2 Q. (BY MR. RADER) 1182, and that is

3 the same withdrawal ticket that you saw on 626,

4 isn't it, ma'am?

5 A. It is.

6 Q. And it goes with a --

7 MS. BAEHR-JONES: Objection.

8 Can we wait? We're not there.

9 MR. RADER: No.

10 MS. BEREKA: Can you do just a

11 control F? That seems to be easy.

12 Q. (BY MR. RADER) And so it also has a

13 credit ticket there for the loan account; is that

14 correct?

15 A. That's correct.

16 Q. And so that entry on the May 2018

17 bank statement, \$30,000 for, "commercial cash,"

18 didn't have anything to do with cash at all, did it?

19 MS. BAEHR-JONES: Objection.

20 A. That's correct.

21 Q. (BY MR. RADER) That's exactly what

22 you testified to earlier, right? That it could be a

23 transfer or any other sort of thing, correct?

24 MS. BAEHR-JONES: Objection.

25 A. That is correct.

1 Q. (BY MR. RADER) All right. Let's
2 look at Bate stamp 579, which is the bank statement
3 for March 31st, 2018, and which I will make Exhibit
4 No. 95.

5 MS. BEREKA: 95? I'm sorry.

6 MR. RADER: Yeah.

7 (Exhibit 95 marked).

8 Q. (BY MR. RADER) Okay. And if you
9 will look at that Bate page down at the bottom, do
10 you see an entry for commercial cash there?

11 A. I do.

12 Q. For how much?

13 A. 50,000.

14 Q. And what's the date on that?

15 A. That is 3/2.

16 Q. Of 2018?

17 A. Of 2018. Yes, sir.

18 Q. All right. If you look at the very
19 last page of that bank statement, which is what Bate
20 number on the bottom right?

21 A. 593.

22 Q. All right. Do you see a withdrawal
23 ticket there for that same \$50,000 amount?

24 A. I do.

25 Q. All right. I will ask you to look

1 now at Bate 1179 which, again, is the loans.

2 MR. RADER: And I'm marking that
3 Exhibit No. 96.

4 (Exhibit 96 marked).

5 Q. (BY MR. RADER) Do you see that same
6 withdrawal ticket on that page, 1179?

7 A. I do.

8 Q. For \$50,000.

9 A. That's correct.

10 Q. And does it show the credit tickets
11 there above it?

12 MS. BAEHR-JONES: Danny, we can't
13 get the exhibit out.

14 A. Yes.

15 MS. BAEHR-JONES: Can you please
16 wait for us to get the exhibit out?

17 Q. (BY MR. RADER) And what does the
18 credit show?

19 MS. BAEHR-JONES: Danny, we
20 can't --

21 A. \$50,000 to the line of credit.

22 Q. (BY MR. RADER) All right. Is there
23 any cash involved in that transaction?

24 MR. RADER: Objection.

25 A. No cash involved in that one.

1 Q. (BY MR. RADER) All right. I want
2 to ask you to look at the bank statement for
3 August 31st, 2018. It begins on Bate 663, and that
4 bank statement ends on 681.

5 MR. RADER: And we are going to
6 look at it and we're going to compare it to
7 Bate 1187 through 1191, if you all want to
8 be pulling those two sets up, but we'll
9 start first with the bank statement 663.
10 And I've marked it Exhibit No. 97.

11 (Exhibit 97 marked).

12 Q. (BY MR. RADER) Will you take a
13 moment to look through there, *FEMALE 4* and
14 see if you see any commercial cash transactions on
15 that bank statement?

16 A. I do on 8/6.

17 Q. All right. And how much is it?

18 A. 20,000.

19 Q. All right. Let's stop there.

20 There are others, and we'll go through each one .

21 A. Okay.

22 Q. But let's do them one at a time.

23 Will you look at Bates 1187, which
24 I'm marking as Exhibit No. 98.

25 (Exhibit 98 marked).

1 Q. (BY MR. RADER) Does that show a
2 \$20,000 withdrawal on 8/6?

3 A. It does.

4 Q. And does it have a credit that goes
5 with it?

6 A. It does.

7 Q. And what is that money going to?

8 A. Line of credit.

9 Q. All right. So, again, no cash
10 involved in that, even though the bank statement
11 says "commercial cash," right?

12 MS. BAEHR-JONES: Objection.

13 A. Correct.

14 (Exhibit 99 marked).

15 Q. Okay. Now, if you'll return back
16 to Exhibit 97, which is that bank statement, will
17 you look and see if you see any other commercial
18 cash entries?

19 A. 8/16.

20 Q. For how much?

21 A. One is for 403 and one is for
22 10,000.

23 Q. All right. Let's start with the
24 one that's 403. I'll show you Bate stamp 1188 that
25 we'll mark as Exhibit No. 99.

1 And do you see that withdrawal with
2 the same date?

3 A. I do .

4 Q. What's the amount?

5 A. 403.46.

6 Q. Same amount as on that bank
7 statement for commercial cash, right?

8 A. Correct.

9 Q. And is there a credit ticket that
10 goes with that?

11 A. There is.

12 Q. And what is that money going to?

13 A. Line of credit.

14 MS. BAEHR-JONES: Objection.

15 Q. (BY MR. RADER) All right. No cash
16 involved in that transaction either, is it?

17 A. No.

18 COURT REPORTER: Did you mark 99
19 yet?

20 MR. RADER: Yes. I tried to. 99.

21 Q. (BY MR. RADER) Now, you said there
22 was another cash transaction on 8/16.

23 A. Yes, sir.

24 Q. How much was that?

25 A. 10,000.

1 Q. All right. Take a look, if you
2 will, at Bate stamp 1189, which I'm going to mark as
3 Exhibit 100.
4 (Exhibit 100 marked).
5 Q. (BY MR. RADER) Do you see that
6 debit ticket for that \$10,000?
7 A. I do.
8 Q. Is it the same date?
9 A. It's the same date.
10 Q. Does it have a credit ticket that
11 goes with it?
12 A. 10,000 to the line of credit.
13 Q. All right. Once again, no
14 commercial -- no cash involved in that transaction.
15 MS. BAEHR-JONES: Objection.
16 A. No.
17 Q. (BY MR. RADER) All right. Keep
18 looking down that statement and see if you see any
19 more entries for commercial cash.
20 A. I do several pages over on 672.
21 Q. All right.
22 A. And it's for eight -- on 8/22.
23 Q. Okay. How much?
24 A. Commercial cash, 20,000.
25 Q. All right. Well, please look at

1 RENASANT1190, which we will mark as Exhibit 101.

2 (Exhibit 101 marked).

3 Q. (BY MR. RADER) Do you see that
4 withdrawal?

5 A. I do.

6 Q. And do you have a credit ticket
7 that goes with it?

8 A. In the same amount.

9 Q. All right. And what's that money
10 going to?

11 MS. BAEHR-JONES: Objection.

12 A. Line of credit.

13 Q. (BY MR. RADER) All right. Is there
14 any cash involved in that transaction?

15 MS. BAEHR-JONES: Objection.

16 A. No cash.

17 Q. (BY MR. RADER) All right. And you
18 said you saw one more on that same page.

19 A. Yep. 8/27. 20,000.

20 Q. All right. I'll ask you to look at
21 Bate 1191, which I'm now marking as Exhibit 102.

22 (Exhibit 102 marked).

23 Q. (BY MR. RADER) Do you see that
24 \$20,000 withdrawal?

25 A. I do.

1 Q. How much?

2 A. 20,000.

3 Q. Same day?

4 A. Same date.

5 Q. And does it have a credit ticket?

6 A. It does.

7 Q. And where does that money go?

8 MS. BAEHR-JONES: Objection.

9 A. Line of credit.

10 Q. (BY MR. RADER) Is there any cash

11 involved in that transaction?

12 MS. BAEHR-JONES: Objection.

13 A. No cash involved.

14 Q. (BY MR. RADER) All right. So we've

15 looked through this entire statement. We've seen

16 tens of thousands of dollars worth of entries that

17 say commercial cash, but there's not the first

18 dollar bill being changed hands, is there?

19 MS. BAEHR-JONES: Objection.

20 A. It's not.

21 Q. (BY MR. RADER) It's all just an

22 electronic transfer, just like you talked about,

23 right?

24 MS. BAEHR-JONES: Objection.

25 A. That's correct.

1 Q. (BY MR. RADER) All right. Let's
2 look at Exhibit 77.

3 All right. On the first page of
4 Exhibit 77, which is RENASANT938, do you see a
5 commercial cash transaction on March 24th?

6 A. I do.

7 Q. How much?

8 A. \$33,282.

9 Q. And 50 cents, right?

10 A. And 50 cents.

11 Q. If you turn to the very next page
12 in that package, which is Bates 944 --

13 A. Yes.

14 Q. -- do you see down in the bottom
15 left the withdrawal ticket for that same amount?

16 A. Yes.

17 Q. And what does it say that that
18 money is going to?

19 A. It's going to pay invoices for
20 Skyline Restoration, 1051, 1066, 1067, 1069, 1070.

21 Q. And those numbers, 1051, 1066,
22 1067, 1069, and 1070, those are invoice numbers?

23 A. Those are invoice numbers.

24 Q. All right. Is that the kind of
25 transaction that would be a legitimate thing for a

1 commercial contracting business to pay?

2 MS. BAEHR-JONES: Objection.

3 A. Yes, sir.

4 Q. (BY MR. RADER) If you look on that
5 first page of Exhibit No. 77 again, there was
6 another entry that says commercial cash for \$850.

7 A. Yes.

8 Q. If you turn to the next page of
9 that, do you see that debit ticket?

10 A. I do.

11 Q. And is that -- what is that?

12 A. It's a transfer to me.

13 Q. And is that for your -- holding
14 your license?

15 A. Yes, sir.

16 MS. BAEHR-JONES: Objection.

17 Q. (BY MR. RADER) The same arrangement
18 that you had all along?

19 A. The whole time.

20 MS. BAEHR-JONES: Objection.

21 Q. (BY MR. RADER) All right. And that
22 is signed by -- both of those, in fact, on 944, the
23 second page of Exhibit 77, both have a signature on
24 them.

25 Whose signature is that?

1 A. Stephany Brewer.

2 Q. Is that the same bank employee who
3 signed the official check of Renasant Bank that we
4 looked at earlier?

5 A. That is.

6 MS. BAEHR-JONES: Objection to that
7 question.

8 COURT REPORTER: When you put the
9 papers on that microphone --

10 MR. RADER: I'm sorry.

11 Q. (BY MR. RADER) All right. If
12 you'll turn to the next page, which is RENASANT950
13 on Exhibit 77, do you see two commercial cash
14 entries there on April 24th?

15 A. Yes.

16 Q. If you turn to the next page, do
17 you see those -- do you see a transaction in the
18 same amount of one of those?

19 A. I do.

20 Q. And what is that amount?

21 A. \$29,040.

22 Q. All right. And that's entered on
23 the prior page as "commercial cash," right?

24 A. It is.

25 Q. But if you look here, you've got

1 two tickets on what is Bate stamped 1211 with that
2 same amount, right?

3 A. Yes, for an invoice.

4 Q. And do you see the invoice number?

5 A. 1072.

6 Q. Okay. And on the left side, that
7 left ticket says checking deposit, right?

8 A. It does.

9 Q. So that money left account number
10 [redacted] and went into Skyline Restoration account [redacted]
11 correct?

12 MS. BAEHR-JONES: Objection.

13 A. That's correct.

14 Q. (BY MR. RADER) No cash involved in
15 that transaction either, was it?

16 MS. BAEHR-JONES: Objection.

17 A. No. There was not cash involved.

18 Q. (BY MR. RADER) When plaintiffs'
19 counsel is insinuating that there are all of these
20 large cash transactions, is that borne out by the
21 exhibits that you've reviewed today?

22 MS. BAEHR-JONES: Objection.

23 A. It's not.

24 Q. (BY MR. RADER) Has plaintiffs'
25 counsel showed you a transaction that was actually a

1 withdrawal in cash, other than that 7500 that was
2 signed by Ryan Akers, in this entire day of
3 deposition?

4 A. No.

5 MS. BAEHR-JONES: Objection.

6 Q. (BY MR. RADER) If you look at
7 Bates -- staying with Exhibit 77, if you look at
8 Bate stamp No. 962 --

9 A. Yes.

10 Q. -- do you see a direct deposit
11 there on May 15th?

12 A. I do.

13 Q. How much is that?

14 A. \$15,899.

15 Q. What does -- who does it say it's
16 from just below the words direct deposit?

17 A. Paramount.

18 Q. Is that a job that was being worked
19 on?

20 A. It is.

21 Q. Can you tell us a little bit about
22 that?

23 A. I don't know a lot about it because
24 I wasn't like the day-to-day, but it's Paramount
25 Theater.

1 Q. Okay. Above that, there's one
2 that's listed for commercial cash on May 29th on
3 Page 962.

4 A. Yes.

5 Q. I'll ask you to look at Bates 965,
6 which I'm going to mark as Exhibit 103.

7 (Exhibit 103 marked).

8 Q. (BY MR. RADER) Do you see a
9 transaction in that same amount?

10 A. I do.

11 Q. And does it say what it's for?
12 Does it say transfers or xfer?

13 A. It does.

14 Q. All right. Does it say per
15 customer request?

16 A. It does.

17 Q. And it references a person named
18 Carrie Keys.

19 A. It does.

20 Q. And did you say Carrie Keys was
21 somebody that worked for Glass & Concrete at the
22 time?

23 A. Yes, sir.

24 Q. So nothing that indicates that that
25 was a cash withdrawal either, right?

1 MS. BAEHR-JONES: Objection.

2 A. Correct.

3 Q. (BY MR. RADER) Do you think that
4 the plaintiffs' attorney just doesn't understand how
5 to read these bank statements, or do you think she's
6 insinuating that there are really all these cash
7 withdrawals?

8 MS. BAEHR-JONES: Objection.

9 A. I think it was intentional.

10 Q. (BY MR. RADER) All right. If
11 you'll turn -- staying with Exhibit 77, please turn
12 to RENASANT985.

13 A. Yes.

14 Q. Do you see a two commercial cash
15 transactions there on July 31st?

16 A. I do.

17 Q. I want to show you what is
18 RENASANT989, which I'm marking as Exhibit 104.

19 (Exhibit 104 marked).

20 Q. (BY MR. RADER) Do you see
21 withdrawal tickets in the same amounts as those
22 commercial cash entries?

23 A. I do.

24 Q. All right. Let's start with the
25 big one.

1 What was the big amount?

2 A. \$19,273.

3 Q. All right. Now, does it say where

4 that money went?

5 A. That went to Skyline Restoration.

6 Q. All right. Any cash involved in

7 that transaction?

8 MS. BAEHR-JONES: Objection.

9 A. No cash involved in that.

10 Q. (BY MR. RADER) All right. Now,

11 it's a little hard to read on the small copy, so I'm

12 going to pull it up big on my computer screen here

13 so you can see it.

14 A. It actually says, "Final payment

15 for Paramount."

16 Q. All right. So you can -- you've

17 got better eyes than I do. I had to blow it up to

18 look at it.

19 But now Paramount, is that the

20 business that we just talked about?

21 A. It's the job that we just talked

22 about.

23 Q. All right. It's a theater that

24 they worked on?

25 A. That's correct.

1 Q. All right. Anything unusual about
2 a transaction like that?

3 MS. BAEHR-JONES: Objection.

4 A. There's nothing unusual about this
5 for a commercial construction company, no.

6 Q. (BY MR. RADER) All right. And the
7 850 that was the other commercial cash transaction
8 there on that same page, is that also reflected on
9 this Exhibit 104 that I just provided you?

10 A. It is.

11 Q. And is that a payment -- your \$850
12 payment for your license?

13 A. That is.

14 Q. All right. Now, do you -- this
15 Exhibit 77 has a lot of pages to it.

16 A. It does.

17 Q. Plaintiffs' counsel gave this to
18 you, right?

19 A. That's correct.

20 Q. She omitted these pages that we've
21 marked as Exhibits 104 and 103, didn't she?

22 MS. BAEHR-JONES: Objection.

23 A. I understand. Yes, she did.

24 Q. (BY MR. RADER) And when we put
25 those together with this Exhibit 77, we see the

1 complete picture, don't we?

2 MS. BAEHR-JONES: Objection.

3 A. Yes, we do.

4 Q. (BY MR. RADER) Do you have any idea
5 why plaintiffs' counsel would withhold these
6 important pages in order to give you complete
7 context?

8 MS. BAEHR-JONES: Objection.

9 A. To confuse me, and they also don't
10 suit the narrative.

11 MS. BAEHR-JONES: Objection.

12 Q. (BY MR. RADER) All right. When you
13 look at the additional pages, does it give you the
14 complete story so that you can explain what these
15 transactions are about?

16 MS. BAEHR-JONES: Objection.

17 A. Yes.

18 Q. (BY MR. RADER) Plaintiffs' counsel
19 asked you what a bank employee would testify to.

20 Do you think a bank employee would
21 have an opportunity to look at their own complete
22 paperwork?

23 MS. BAEHR-JONES: Objection.

24 A. They would.

25 Q. (BY MR. RADER) Okay. But once

1 again, as we've gone through this entire Exhibit 77,
2 we didn't see a single cash transaction, right?

3 MS. BAEHR-JONES: Objection.

4 A. That's correct.

5 Q. (BY MR. RADER) And even though
6 these entries say commercial cash, it's just like
7 you described, which is that it's a transfer,
8 correct?

9 MS. BAEHR-JONES: Objection.

10 A. Described multiple times.

11 Q. (BY MR. RADER) All right. Now, the
12 person that you talked to when you were with your
13 mother in Daytona on March 7th, 2022, was that
14 person nice to you?

15 MS. BAEHR-JONES: Objection.

16 A. They were.

17 Q. (BY MR. RADER) Whoever it was, did
18 they treat you professionally?

19 A. They did.

20 MS. BAEHR-JONES: Objection.

21 Q. (BY MR. RADER) Did they tell you
22 why they were calling you?

23 A. I believe it was just to inform me
24 that he was on the run, and I think they might have
25 asked, you know, where he's at or something to that

1 extent. But, yeah, they did tell me.

2 Q. Is that a thing that you think the
3 police would want to know, where he's at?

4 MS. BAEHR-JONES: Objection.

5 A. I do.

6 Q. (BY MR. RADER) Is that a legitimate
7 reason for somebody to call you and ask you where
8 he's at?

9 MS. BAEHR-JONES: Objection.

10 A. At that time, yeah, 100 percent.

11 Q. (BY MR. RADER) You didn't know
12 where he was, though.

13 MS. BAEHR-JONES: Objection.

14 A. No.

15 Q. (BY MR. RADER) And if you had,
16 would you have told them?

17 MS. BAEHR-JONES: Objection.

18 A. 100 percent.

19 Q. (BY MR. RADER) All right.

20 A. I would have done a citizen's
21 arrest.

22 Q. All right. Well, I won't get into
23 The Andy Griffith Show about how that works, but if
24 a law enforcement officer calls you looking for a
25 fugitive, is that law enforcement officer doing his

1 or her job?

2 A. Due diligence, yes.

3 Q. All right. And they made the
4 contact with you and, in fact, you saved the number
5 and did contact them back later, correct?

6 A. I did.

7 Q. And when you contacted them back
8 later, that was memorialized in an email; is that
9 correct?

10 MS. BAEHR-JONES: Objection.

11 A. That's correct.

12 Q. (BY MR. RADER) You were provided
13 that today by plaintiffs' counsel, correct?

14 A. That's correct.

15 MS. BAEHR-JONES: Objection.

16 Q. (BY MR. RADER) And that
17 individual's name was Tyler Whitlock, correct?

18 MS. BAEHR-JONES: Objection.

19 A. That's correct.

20 Q. (BY MR. RADER) And Mr. Whitlock
21 noted -- it's Exhibit 86.

22 MS. BAEHR-JONES: Is that a
23 question?

24 MR. RADER: I was waiting for the
25 witness to collect her exhibit.

1 Q. (BY MR. RADER) Mr. Whitlock noted,
2 "I was just contacted by FEMALE 4 who
3 helped manage his properties. Sean just froze his
4 business account at Renasant Bank on West King
5 Street by phone. There is a good chance he will be
6 going there to officially close the account or try
7 to get money from the account."

8 Is that -- you may or may not have
9 told him those exact words, but did you give him
10 information to that effect?

11 A. Yeah. I mean, I gave them any
12 information that I had. Pertaining to this, managed
13 his properties, is obviously not the correct
14 language or anything. But, yes, I did give them
15 that information.

16 Q. All right. And they indicated that
17 they needed to do extra patrol at your office and
18 your home, correct?

19 A. Yes.

20 Q. And if they -- if he had come to
21 your home when that extra patrol was there, they
22 might have been able to catch him, couldn't they?

23 MS. BAEHR-JONES: Objection.

24 A. Yes.

25 Q. (BY MR. RADER) Of course, he didn't

1 come to your home that day, did he?

2 A. He did not.

3 Q. You wanted the police to find him,
4 didn't you?

5 A. Oh, yeah.

6 Q. And they wanted to find him, too,
7 didn't they?

8 A. I would think so.

9 MS. BAEHR-JONES: Objection.

10 A. Yes.

11 Q. (BY MR. RADER) I'm just going to
12 ask you straight out, have you ever paid cash to any
13 police officer for any reason?

14 MS. BAEHR-JONES: Objection.

15 A. I have never paid a single dollar
16 to any police officer.

17 Q. (BY MR. RADER) All right. You
18 certainly haven't bribed anybody, have you?

19 MS. BAEHR-JONES: Objection.

20 A. I have never bribed anyone.

21 Q. (BY MR. RADER) You haven't paid off
22 officers to try to cover for Sean Williams, have
23 you?

24 MS. BAEHR-JONES: Objection.

25 A. Absolutely not.

1 Q. (BY MR. RADER) You haven't paid
2 Kevin Peters.

3 MS. BAEHR-JONES: Objection.

4 A. I have never met Kevin Peters.

5 Q. (BY MR. RADER) And haven't paid
6 Tyler Whitlock.

7 A. I did not.

8 Q. Hadn't paid Toma Sparks.

9 MS. BAEHR-JONES: Objection.

10 A. I have never met him, talked to
11 him, or paid him, no.

12 Q. (BY MR. RADER) Hadn't paid or
13 talked to or met Justin Jenkins, have you?

14 MS. BAEHR-JONES: Objection.

15 A. No.

16 Q. (BY MR. RADER) All right. Hadn't
17 paid or talked to Jeff Legault.

18 MS. BAEHR-JONES: Objection.

19 A. No.

20 Q. (BY MR. RADER) Hadn't paid or
21 talked to Brady Higgins?

22 MS. BAEHR-JONES: Objection.

23 A. No.

24 Q. (BY MR. RADER) Hadn't paid or
25 talked to Karl Turner.

1 A. No.

2 MS. BAEHR-JONES: Objection.

3 Q. (BY MR. RADER) Hadn't paid or
4 talked to any other police officer with the City of
5 Johnson City.

6 MS. BAEHR-JONES: Objection.

7 A. No one.

8 Q. (BY MR. RADER) Haven't paid or
9 talked to any other employee of the City of Johnson
10 City.

11 MS. BAEHR-JONES: Objection.

12 A. No one.

13 Q. (BY MR. RADER) Would you ever do
14 such a thing?

15 MS. BAEHR-JONES: Objection.

16 A. I would not. I'm offended that
17 I've been accused of -- or allegations have been
18 made of me like that.

19 Q. (BY MR. RADER) Well, I'll represent
20 to you the police officers are, too.

21 MS. BAEHR-JONES: Objection. That
22 is improper.

23 MR. RADER: All right.

24 MS. BAEHR-JONES: And you know it.

25 MR. RADER: No, I don't know that.

1 MS. BAEHR-JONES: You do.

2 MR. RADER: I'm not going to argue

3 with you on the record. I'll do it later.

4 Q. (BY MR. RADER) Have you cooperated

5 with the TBI?

6 A. I have.

7 Q. Have you cooperated with JCPD, as

8 reflected by these records?

9 MS. BAEHR-JONES: Objection.

10 A. Yes, I have.

11 Q. (BY MR. RADER) Have you cooperated

12 with the FBI?

13 MS. BAEHR-JONES: Objection.

14 A. Yes, sir.

15 Q. (BY MR. RADER) Have you cooperated

16 with any law enforcement agency or attorney that has

17 contacted you?

18 MS. BAEHR-JONES: Objection.

19 A. I have.

20 Q. (BY MR. RADER) Do you want the man

21 to be found?

22 MS. BAEHR-JONES: Objection.

23 A. I definitely do. The reason I

24 asked for additional patrol at my house is because I

25 was, in fact, afraid that he would come to my house.

1 I was afraid. Of course I wanted him caught.

2 Q. (BY MR. RADER) Until this lawsuit
3 filed by these Jane Does or B.P. or H.A. that we are
4 here about today, had you ever been accused of
5 bribing these police officers?

6 MS. BAEHR-JONES: Objection.

7 A. No, sir.

8 Q. (BY MR. RADER) And Sean Williams
9 never accused you of bribing these police officers
10 before they filed this lawsuit?

11 MS. BAEHR-JONES: Objection.

12 A. No.

13 Q. (BY MR. RADER) Have you ever
14 laundered funds from Glass & Concrete Contracting,
15 LLC?

16 A. No.

17 Q. Have you ever laundered money
18 through real or artificial subcontractor companies?

19 MS. BAEHR-JONES: Objection.

20 A. I have not.

21 Q. (BY MR. RADER) You ever taken any
22 owner draws to amount to \$2,000 a week?

23 MS. BAEHR-JONES: Objection.

24 A. I have never.

25 Q. (BY MR. RADER) Have you ever paid

1 \$2,000 a week in cash to Toma Sparks?

2 MS. BAEHR-JONES: Objection.

3 A. I have never.

4 Q. (BY MR. RADER) Have you ever paid
5 \$2,000 a week in cash to Toma Sparks or any other
6 JCPD officers?

7 MS. BAEHR-JONES: Objection.

8 A. I have not.

9 Q. (BY MR. RADER) Have you seen this
10 Facebook post?

11 A. I have.

12 Q. Have you read it?

13 A. I read it.

14 Q. And we're talking about the
15 Facebook post that's in Sean Williams' name, but
16 couldn't possibly have been posted by him because he
17 was in prison, right?

18 MS. BAEHR-JONES: Objection.

19 A. That's correct.

20 Q. (BY MR. RADER) And do you know who
21 posted it?

22 A. I believe so.

23 Q. Who do you think posted it?

24 A. I think it was Ms. Vance.

25 Q. Nicole Storm Vance?

1 A. Yes.

2 Q. And have you ever said anything to
3 Nicole Storm Vance about any scheme to pay off any
4 officers?

5 A. No, I have not.

6 Q. Have you ever said anything to Sean
7 Williams about any scheme to pay off officers?

8 A. No, I have not.

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C E R T I F I C A T E

STATE OF TENNESSEE:
COUNTY OF KNOX:

I, Jeffrey D. Rusk, Registered Professional Reporter and Notary Public, do hereby certify that I reported in machine shorthand the foregoing proceedings; that the foregoing pages, inclusive, were prepared by me using computer-aided transcription and constitute a true and accurate record of said proceedings.

I further certify that I am not an attorney or relative of any attorney or counsel connected with the action, nor financially interested in the action.

Witness my hand and official seal
this the 4th day of June, 2024.



Jeffrey D. Rusk

Jeffrey D. Rusk, RPR, CLVS
Notary Public at Large
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